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September 4, 2013

VIA EMAIL AND REGULAR MAIL

Mark P. Herron, Esq.
75 Public Square, Suite 920
Cleveland, Ohio 44113

**Re: *Victoria D. Johnson v. University Hospitals*
EEOC Charge No. 532-2013-00099**

Dear Mark,

As I informed you by voicemail last week, Giffen & Kaminski LLC has been retained to represent University Hospitals Physician Services (and related entities) in connection with the lawsuit filed by your client Victoria Johnson. Please direct all future communication regarding this matter to our office. Kerin Kaminski and I will be handling this matter.

In particular, please provide service copies of all subpoenas issued to date. Our office will coordinate the responses of UH Case Medical Center and Dr. Pallas. I believe Dr. Headen's office already provided a response, so let me know if you have not received it.

In addition, please note that there is no such entity as "University Hospitals," the defendant named in the Complaint. Ms. Johnson's former employer and the proper named defendant is "University Hospitals Physician Services." The easiest way at this point to correct the issue is for you to file an Amended Complaint naming the correct corporate entity. Alternatively, the parties will have to file a joint notice of substitution of parties. Please let me know how you prefer to proceed.

Very truly yours,

Rachael L. Israel

RLI/smy